

REMARKS

Reconsideration of the pending application is respectfully requested in view of the following observations.

1. In the claims

Claim 1 has been amended to remove previously added subject matter and to include the feature that “an upgrade of the value document of the series in addition to or instead of the first feature substance comprises a third feature substance.” Support for this amendatory language may be found at least in paragraph [0036] of the specification.

Claim 3 has been amended so that the “third feature substance” in claim 3 refers to “a third feature substance” of claim 1.

The claims are now considered to be placed in condition for allowance.

No new matter is introduced via the amendment to the claims.

Entry of the amendment to the claims is kindly requested.

2. Rejection of claims 1-6, 8-12, 14-17, 19, 32 and 35 under 35 USC 103 over US patent 6,155,605 (*Bratchley*) in view of US patent 5,169,155 (*Soules*) and US patent 4,496,961 (*Devrient*)

Reconsideration of the rejection is respectfully requested in view of the amendment to the claims and the following observations.

Amended claim 1 now recites a value document comprising a value document substrate and at least two different feature substances for checking the value document of a series. The first feature substance is incorporated into the volume of the substrate of the value document, and the second feature substance is provided on a surface of the value document substrate in the form of a printed coding. Further, an upgrade of the value document of the series in addition to or instead of the first feature substance comprises a third feature substance.

It is submitted that the proposed combination of *Bratchley*, *Soules*, and *Devrient* does not teach or suggest all of the features of amended claim 1.

*Bratchley* in combination with *Soules* and *Devrient* does not teach or suggest an upgrade of the value document of a series of value documents or the upgrade of the value

document of the series in addition to or instead of the first feature substance comprises a third feature substance.

*Bratchley* is directed to a banknote with a high security entity (HSE) and/or a low security entity (LSE). *Bratchley*, however, does not disclose that this banknote is part of a series of banknotes. Furthermore, *Bratchley* does not teach upgrading the banknote in any way. The discussion within *Bratchley* is focused on the HSE and LSE and the different ways that the HSE and LSE may be embodied or incorporated into the banknote. The HSE and LSE are used for security and authentication of banknotes depending on the situation. In particular, the HSE is used for higher security applications in banks, and the LSE is used with a simpler detector in retail outlets (see col. 3, lines 58-66). Thus, *Bratchley* does not teach upgrading a banknote of a banknote series, or using the HSE or LSE as a way of upgrading banknotes.

Moreover, *Bratchley* does not disclose the option of replacing a first feature substance with a third feature substance such that the second feature substance and the third feature substance are incorporated into the value document without the first feature substance or adding the third feature substance to the first and the second feature substances in the value document as an upgrade to a value document series. While *Bratchley* discloses the HSE to be a homogeneous mixture of at least two components and the LSE to be a single component, *Bratchley* does not disclose replacing or adding to existing components or entities as an upgrade of the banknote.

Furthermore, the office action, on page 2, interprets the LSE to be the second feature substance and the two components of the HSE to be the first and the third feature substances. In summary, the office action interprets the HSE and the LSE to teach the first, second, and third feature substances. Following this interpretation, a skilled person would not upgrade the banknote of *Bratchley* by replacing the first feature substance or by adding the third feature substance.

*Bratchley* discloses that two security entities are present on the banknote, either the HSE and LSE together or two HSEs together (see col. 3, lines 62-67). Since two security entities are always present, a component of one entity cannot be used to replace the component of another entity. Further, *Bratchley* does not suggest adding a third security entity as an upgrade, and a skilled person would not add a third security entity as an upgrade

since a second HSE or LSE is unnecessary and *Bratchley* does not indicate any upgrades occurring to the banknotes. Depending on the security level required by the user, the user can check the authenticity of the banknote using the first HSE or LSE. Moreover, since the banknotes of *Bratchley* are not part of a series, a skilled person would not see the need to upgrade the banknotes by replacing or adding another feature substance. Thus, it would not have been obvious to a skilled person to upgrade the banknote in *Bratchley* as required by amended claim 1.

*Soules* and *Devrient* also do not disclose these features. *Soules* is directed to coding playing cards so that the playing cards may be easily and quickly identified by a machine. *Soules* does not address upgrading of playing cards and further is silent as to upgrading by replacing or adding feature substances.

*Devrient* is directed to a check embedded with microcapsules such that when pressure is applied to the check the capsules break allowing leuco ink and color acceptor to react with each other. *Devrient* fails to address upgrading the check especially upgrading by replacing or adding feature substances.

Therefore, the proposed combination of *Bratchley*, *Soules*, and *Devrient* fails to teach or suggest all of the features required by amended claim 1.

Moreover, claims 2-6, 8-12, 14-17, 19, 32 and 35 depend from claim 1 and are likewise allowable in view of their dependency from claim 1 and their individually recited features.

Accordingly, withdrawal of the rejection of the claims in view of the prior art is kindly requested.

3. Rejection of claim 7 under 35 USC 103 over US patent 6,155,605 (*Bratchley*) in view of US patent 5,169,155 (*Soules*), US patent 4,496,961 (*Devrient*), and European Patent EP 0 052 624 (*Kaule*)

Claim 7 depends from claim 1 and is likewise allowable in view of its dependency from claim 1 as discussed above and its individually recited features. Moreover, *Kaule* does not cure the deficiencies of *Bratchley*, *Soules*, or *Devrient*.

Accordingly, withdrawal of the rejection of the claims in view of the prior art is kindly requested.

4. Rejection of claims 33 and 34 under 35 USC 103 over US patent 6,155,605 (*Bratchley*) in view of US patent 5,169,155 (*Soules*), US patent 4,496,961 (*Devrient*), and Anti-Stokes Phosphors/Luminophors (*ASPL*)

Claims 33 and 34 depend from claim 1 and are likewise allowable in view of their dependency from claim 1 as discussed above and their individually recited features. Moreover, *ASPL* does not cure the deficiencies of *Bratchley*, *Soules*, or *Devrient*.

Accordingly, withdrawal of the rejection of the claims in view of the prior art is kindly requested.

5. Conclusion

As a result of the amendment to the claims, and further in view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is respectfully requested that every pending claim in the present application be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the applicant's attorney, the examiner is invited to contact the undersigned at the numbers shown below.

BACON & THOMAS, PLLC  
625 Slaters Lane, Fourth Floor  
Alexandria, Virginia 22314-1176  
Phone: (703) 683-0500  
Facsimile: (703) 683-1080

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Respectfully submitted,

/Justin J. Cassell/

JUSTIN J. CASSELL  
Attorney for Applicant  
Registration No. 46,205